

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF MICHELLE YBARRA
IN SUPPORT OF DEFENDANT GOOGLE LLC'S
MOTION TO EXCLUDE CERTAIN OPINION TESTIMONY OF PHILIP GREEN**

I, Michelle Ybarra, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and am admitted *pro hac vice* to practice before this Court. I am an attorney at the law firm of Keker, Van Nest & Peters LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Motion to Exclude the Testimony of Phillip Green. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Mr. Philip Green, served on December 22, 2022.

4. Attached as **Exhibit B** is a true and correct copy of the Expert Report of Dr. Sunil Khatri (“Khatri Report”), served on December 22, 2022.

5. Attached as **Exhibit C** is a true and correct copy of Google’s Training Chips Revealed: TPUv2 and TPUv3 (GOOG-SING-00027590).

6. Google’s counsel deposed Mr. Philip Green on March 23, 2023. Attached as **Exhibit D** are true and correct excerpts of Mr. Green’s deposition transcript (“Green Deposition Transcript”).

7. Attached as **Exhibit E** is a true and correct copy of the Platforms for Machine Learning October 2017 (GOOG-SING-00239048).

8. Google’s counsel deposed Mr. Philip Isaak on March 21, 2023. Attached as **Exhibit F** are true and correct excerpts of Mr. Isaak’s deposition transcript (“Isaak Deposition Transcript”).

9. Attached as **Exhibit G** is a true and correct copy of the Google Platforms for Machine Learning 2019 Session 2: TPU Architecture (GOOG-SING-00144591).

10. Attached as **Exhibit H** is a true and correct copy of the Google TPUv2 and TPUv3 versus Volta (GOOG-SING-00101399).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on April 28, 2023 at San Francisco, California.

/s/ Michelle Ybarra

Michelle Ybarra

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed